

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

MATTEL, INC.

Plaintiff,

vs.

THE ENTITIES DOING BUSINESS  
AS GOODMENOW AT THE URL  
GOODMENOW.COM, ET AL.,

Defendants.

Civil Action No.: 1:20-cv-11075-NRB

**DECLARATION OF XIN CHENG**

I, Xin Cheng, do hereby depose and state:

1. My name is Xin Cheng, and I am over the age of eighteen.
2. I am the CEO of Yokawa Network Limited ("Yokawa"), a business entity duly incorporated under the laws of Hong Kong, SAR, China, with its principal place of business in Hong Kong.
3. I do not own or control any entity by the name Yokawa other than Yokawa Network Limited, a business entity duly incorporated under the laws of Hong Kong, SAR, China, with its principal place of business in Hong Kong.
4. Yokawa does business as GoodMeNow at the website [www.goodmenow.com](http://www.goodmenow.com), MeetGoodTimes at the website [meetgoodtimes.com](http://meetgoodtimes.com), FeelItNice at the website [www.feelitnice.com](http://www.feelitnice.com), and as Yokawa Network Limited.
5. Yokawa has operated an e-commerce business since December 2019. Yokawa sells more than 100 different kinds of products under 84,531 SKUs (Stock Keeping Units).
6. In the fourth quarter of 2020, Yokawa's revenue was more than \$19 million USD.

7. Yokawa depends on the flow of money through its PayPal accounts to operate its business. If all of Yokawa's PayPal accounts remain frozen, Yokawa's business will suffer substantial losses.
8. Yokawa owns and controls the eleven PayPal accounts, associated with the following email addresses:
- a. yokawa@126.com
  - b. yougoodplus@163.com
  - c. yocute@126.com
  - d. youdate@126.com
  - e. vojudy@126.com
  - f. vostep@163.com
  - g. yowords@163.com
  - h. yowishes@163.com
  - i. volova@sina.com
  - j. voepoch@sina.comf
  - k. Yohoke@sina.com
9. Yokawa has only one PayPal account affiliated with each of the above eleven email addresses.
10. I declare that the foregoing is true and correct under penalty of perjury.

Dated: this 14<sup>th</sup> day of January, 2021.  
Hong Kong, SAR, China

XIN CHENG

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XIN CHENG